

STATE OF SOUTH CAROLINA

(Caption of Case)

Application of Time Warner Cable Information
Services (South Carolina), LLC, d/b/a Time
Warner Cable to Amend its Certificate of Public
Convenience and Necessity to Provide Telephone
Services in the Service Areas of Farmers Telephone
Cooperative, Inc., et al.
Docket Nos. 2008-325-C through 2008-329-C

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

COVER SHEET

DOCKET
NUMBER: 2008 - 328 - C

(Please type or print)

Submitted by: Margaret M. Fox

Address: McNair Law Firm, P.A.

P O Box 11390

Columbia, SC 29211

SC Bar Number: 6176

Telephone: 803-799-9800

Fax: 803-753-3219

Other:

Email: pfox@mcnair.net

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition☐ Request for item to be placed on Commission's Agenda expeditiously☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input checked="" type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certification
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input checked="" type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input checked="" type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Oder	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other: _____	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

Print Form

Reset Form

M. John Bowen, Jr.

jbowen@mcnair.net

T (803) 799-9800

F (803) 753-3219

January 2, 2009

via Electronic Filing

The Honorable Charles L.A. Terreni
P.O. Drawer 11649 (29211)
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

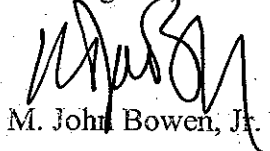
RE: Application of Time Warner Cable Information Services (South Carolina), LLC, d/b/a Time Warner Cable, to Amend Its Certificate of Public Convenience and Necessity to Provide Telephone Services in the Service Areas of Farmers Telephone Cooperative, Inc., *et al.*
Docket Nos. 2008-325-C through 2008-329-C

Dear Mr. Terreni:

Attached for filing please find a Motion for Admission *Pro Hac Vice* for Thomas J. Navin on behalf of Farmers Telephone Cooperative, Inc.; Fort Mill Telephone Co., d/b/a Comporium Communications; Home Telephone Co, Inc.; PBT Telecom, Inc.; and Rock Hill Telephone Co., d/b/a Comporium Communications, in the above-referenced dockets. By copy of this letter, I am serving a copy of this Motion on all parties of record.

If you have any questions or need additional information, please do not hesitate to contact me.

Best regards,


M. John Bowen, Jr.

Enclosures

cc: Thomas J. Navin, Esq.
Parties of record

McNair Law Firm, P.A.
The Tower at 1301 Gervais
1301 Gervais Street
11th Floor
Columbia, SC 29201

Mailing Address
Post Office Box 11390
Columbia, SC 29211

mcnair.net

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

In Re: Application of Time Warner Cable)
Information Services (South Carolina), LLC)
d/b/a Time Warner Cable to Amend Its)
Certificate of Public Convenience and Necessity) (Docket No. 2008-325-C)
to Provide Telephone Services in the Service Area)
of Farmers Telephone Cooperative, Inc.)
and for Alternative Regulation)
_____)

In Re: Application of Time Warner Cable)
Information Services (South Carolina), LLC)
d/b/a Time Warner Cable to Amend Its)
Certificate of Public Convenience and Necessity) (Docket No. 2008-326-C)
to Provide Telephone Services in the Service Area)
of Fort Mill Telephone Company, d/b/a Comporium)
Communications, and for Alternative Regulation)
_____)

In Re: Application of Time Warner Cable)
Information Services (South Carolina), LLC)
d/b/a Time Warner Cable to Amend Its)
Certificate of Public Convenience and Necessity) (Docket No. 2008-327-C)
to Provide Telephone Services in the Service Area)
of Home Telephone Company, Inc.,)
and for Alternative Regulation)
_____)

In Re: Application of Time Warner Cable)
Information Services (South Carolina), LLC)
d/b/a Time Warner Cable to Amend Its)
Certificate of Public Convenience and Necessity) (Docket No. 2008-328-C)
to Provide Telephone Services in the Service Area)
of PBT Telecom, Inc., and for Alternative Regulation)
_____)

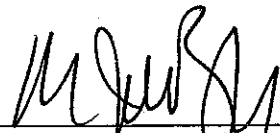
In Re: Application of Time Warner Cable)
Information Services (South Carolina), LLC)
d/b/a Time Warner Cable to Amend Its)
Certificate of Public Convenience and Necessity) (Docket No. 2008-329-C)
to Provide Telephone Services in the Service Area)
of Rock Hill Telephone Company, d/b/a Comporium)
Communications, and for Alternative Regulation)
_____)

**MOTION FOR ADMISSION
PRO HAC VICE**

Farmers Telephone Cooperative, Inc., Fort Mill Telephone Company, d/b/a
Comporium Communications, Home Telephone Company, Inc., PBT Telecom, Inc.

and Rock Hill Telephone Company, d/b/a Comporium Communications, (collectively, "the RLECs") respectfully move the Public Service Commission of South Carolina ("the Commission") to permit Thomas J. Navin to practice *pro hac vice* before the Commission in the above-referenced matters. The RLECs further request that this Motion be taken up by the Commission as soon as possible but not later than at the beginning of the first day of the hearing in these proceedings, which is scheduled to begin on Tuesday, January 6, 2009. Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Mr. Navin, together with the undersigned counsel of record, have filed an application for admission *pro hac vice* with the Supreme Court of South Carolina, which is attached to this Motion.

Respectfully Submitted,



M. John Bowen, Jr.
McNair Law Firm, P.A.
Post Office Box 11390
Columbia, S.C. 29211
(803) 799-9800
jbowen@mcnair.net

Attorneys for Farmers Telephone
Cooperative, Inc., Fort Mill Telephone
Company, d/b/a Comporium
Communications, Home Telephone
Company, Inc., PBT Telecom, Inc. and
Rock Hill Telephone Company, d/b/a
Comporium Communications

January 2, 2009
Columbia, South Carolina

**VERIFIED APPLICATION FOR ADMISSION *PRO HAC VICE*
IN THE STATE OF SOUTH CAROLINA**

Application of Time-Warner Cable Info.
Serv. to Amend its CPCN

Docket Nos. 2008-325-329-C

South Carolina Public Service
Commission

Plaintiff

Case No.

Court

vs.

Farmers Telephone Cooperative, Inc. et al.

Defendant

Mailing Address of Court:

Public Service Commission of South
Carolina,

101 Executive Center Dr., Suite 100
Columbia, SC 29210

Comes now Thomas J. Navin, applicant herein, and respectfully represents the following:

RECEIVED

JAN 2 - 2009

S.C. SUPREME COURT
22066
Zip Code

1. Applicant resides at:

11111 Bowen Avenue

Street Address

Great Falls

Fairfax

VA

City

County

State

7034509164

Telephone

2. Applicant is an attorney and a member of the law firm of (or practices law under the name of) Wiley

Rein, LLP, with offices at, at

1776 K. Street

Street Address

Washington

City

County

DC

State

20006

Zip Code

2027197487

Telephone

2027197049

Fax Number

3. Applicant has been retained personally or as a member of the above named law firm by McNair Law Firm to provide legal representation in connection with the above case now pending before the above named court of the State of South Carolina.

4. Since January of 1996, applicant has been, and presently is, a member in good standing of the bar of the highest court of the District of Columbia or the State of District of Columbia where applicant regularly practices law. Attached is a certificate of good standing.

5. Applicant has been admitted to practice before the following courts: (List all of the following courts applicant has been admitted to practice before: United States District Courts; United States Circuit Courts of Appeals; the Supreme Court of the United States; and courts of other states or the District of Columbia.)

Court:

Date Admitted:

The Courts of the Commonwealth of Virginia	November 1994
The Courts of the District of Columbia	January 1996

Applicant is presently a member in good standing of the bars of those courts listed above, except as listed below:
(List any court named in the preceding paragraph that applicant is no longer admitted to practice before.)

Applicant is currently in good standing in the Commonwealth of Virginia but inactive in status.

6. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency, except as provided below (give particulars, e.g., jurisdiction, court, date):

N/A

7. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked, except as provided below (give particulars, e.g., date, court, docket number, judge, circumstances; attach a copy of any order of denial or revocation):

N/A

8. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked, except as provided below (give particulars, e.g., date, administrative body, date of suspension and reinstatement):

N/A

9. Local counsel of record associated with applicant in this case is M. John Bowen, Jr., of the McNair Law Firm, P.A., which has offices at:
10. Post Office Box 11390

Street Address

Richland

Columbia

SC

29211

County

City

State

Zip Code

803-799-9800

Telephone

If applicable list all other firms/attorneys you are associated with in this matter

N/A

10. Applicant has previously filed an application to appear *pro hac vice* in the following South Carolina cases (give case name and status of litigation, date of application, local counsel of record in each case, and state whether application is pending or was granted).

N/A

11. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

12. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 15th day of December, 2008.

Thomas J. Navin
APPLICANT

VERIFICATION

STATE OF District of Columbia)

COUNTY OF _____)

I, Thomas J. Navin, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents thereof, and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

Thomas J. Navin
APPLICANT/AFFIANT

Subscribed and sworn to before me this 15th day of December, 2008.

Paul M. Don

Notary Public for the State of Washington DC

My Commission Expires: 6-14-10

LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 2d day of JAN 2009.

W. Randolph
LOCAL COUNSEL OF RECORD

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by mail addressed to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 15 day of DEC 2008.

Thomas J. Navin
APPLICANT/AFFIANT



VIRGINIA STATE BAR

CERTIFICATE OF GOOD STANDING

*THIS IS TO CERTIFY THAT **THOMAS JOHN NAVIN** IS AN ASSOCIATE MEMBER OF THE VIRGINIA STATE BAR
IN GOOD STANDING. MR. NAVIN WAS LICENSED TO PRACTICE LAW IN VIRGINIA ON **OCTOBER 6, 1994**, AFTER
SUCCESSFULLY PASSING THE BAR EXAMINATION GIVEN BY THE VIRGINIA BOARD OF BAR EXAMINERS.*

Issued December 17, 2008

KAREN A. GOULD
EXECUTIVE DIRECTOR AND
CHIEF OPERATING OFFICER



District of Columbia Court of Appeals
Committee on Admissions
500 Indiana Avenue, N.W. — Room 4200
Washington, D. C. 20001
202 / 879-2710

I, GARLAND PINKSTON, JR., Clerk of the District of Columbia
Court of Appeals, do hereby certify that

Thomas J. Navin

was on the 5th day of January, 1996

duly qualified and admitted as an attorney and counselor and
entitled to practice before this Court and is, on the date
indicated below, an active member in good standing of this Bar.

In Testimony Whereof, I have
hereunto subscribed my name
and affixed the seal of this
Court at the City of
Washington, D.C., on May 30,
2008.

GARLAND PINKSTON, JR., CLERK

By: Christopher C. Dip
Deputy Clerk

CERTIFICATE OF SERVICE

I hereby certify that I caused to have served a copy of this application upon the South Carolina Supreme Court by hand delivery to: South Carolina Supreme Court Office of Bar Admissions, PO Box 11330, Columbia, SC 29211, accompanied by payment of the \$250 filing fee payable to the South Carolina Supreme Court on this 2d day of Jan, 2009.

Sue Ann J. Shaw

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

Docket Nos. 2008-325-C – 2008-329-C

IN RE: Application of Time Warner Cable Information)
 Services (South Carolina), LLC, d/b/a Time)
 Warner Cable to Amend its Certificate of Public)
 Convenience and Necessity)

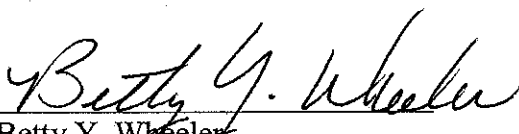
**CERTIFICATE
OF SERVICE**

I, Betty Y. Wheeler, do hereby certify that I have this date served one (1) copy of a Motion *Pro Hac Vice* on behalf of Farmers Telephone Cooperative, Inc., Fort Mill Telephone Company, Home Telephone Company, Inc., PBT Telecom, Inc. and Rock Hill Telephone Company upon the following counsel of record by causing said copies to be deposited with the United States Postal Service, first class postage prepaid and affixed thereto, and addressed as follows

Frank Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P. C.
Post Office Box 944
Columbia, South Carolina 29202

Jeffrey M. Nelson, Esquire
Nanette S. Edwards, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, South Carolina 29211

C. Bradley Hutto, Esquire
Williams & Williams
Post Office Box 1084
Orangeburg, South Carolina 29115


Betty Y. Wheeler
McNAIR LAW FIRM, P.A.
Post Office Box 11390
Columbia, South Carolina 29211
(803) 799-9800

January 2, 2009

Columbia, South Carolina